

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION X**

**1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101**

**JAN 17 1983**



**REPLY TO  
ATTN OF:**

**M/S 533**

**JAN 12 1983**

**Arlene A. Hendrickson  
Environmental Engineer  
Ashland Chemical Company  
P. O. Box 2219  
Columbus, Ohio 43216**

**Dear Ms. Hendrickson:**

**On December 2, 1982, you requested that the Environmental Protection Agency (EPA) Region 10 consider the following Ashland Chemical Company plants as having interim status.**

- 1. Ashland Chemical Company  
619 SW. Wood Street  
Hillsboro, Oregon 97123  
EPA Facility No. ORD000711564**
- 2. Ashland Chemical Company  
831 Fifth Avenue South  
Kent, Washington 98031  
EPA Facility No. WAD05711177**

**As you know, interim status is granted by statute when three conditions have been met. First, the facility must have been operating as a hazardous waste management facility prior to November 19, 1980. Your position paper indicates that all of the Ashland Chemical Company plants were managing hazardous waste prior to this date. It is our understanding that only off-specification commercial chemical products were stored at the Kent and the Hillsboro plants prior to November 19, 1980. The fact that you now wish to expand your operation to include storage of spent solvents for your customers does not pose a problem. This would be considered the same as a request for a process change under interim status. This condition for attaining interim status is, therefore, met. Secondly, the owner or operator of the facility must have submitted the Notification of Hazardous Waste Activity (EPA Form 8700-12) prior to August 18, 1980. We received the form for both the Kent and the Hillsboro plants before that date and, therefore, this condition is met. Thirdly, the owner or operator of the facility must have submitted the Part A**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK NEW YORK 10278

(212) 264-9898

JUN 9 1982

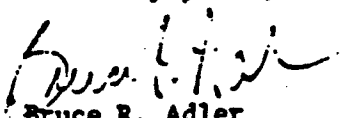
Ms. Arlene Hendrickson  
Engineering Department  
Ashland Chemical Company  
P.O. Box 2219  
Columbus, Ohio 43216

Dear Ms. Hendrickson:

I am writing in response to your letter of May 5, 1982, regarding the amendment of a Part A permit application submitted for the Ashland Chemical Corporation facility in Syracuse, New York. As we have discussed on the telephone, the determining factor in whether Ashland can achieve interim status as a storage facility is whether the company was storing or accumulating wastes of an identical or similar nature prior to November 19, 1980. It is my understanding that Ashland was storing spent or off-spec halogenated solvents at its Syracuse facility before the November 19 date. As such, Ashland is eligible to achieve interim status as a storage facility for those wastes at its Syracuse plant.

Please note that, should it be established that any of the assumptions upon which this letter is based are untrue or invalid, any rights conferred herein may, if appropriate, be withdrawn. Should you have any questions, please call me at (212) 264-9898.

Sincerely yours,

  
Bruce R. Adler  
Attorney  
General Enforcement Branch  
Enforcement Division